

## AGNIFILO INTRATER

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July 8, 2025

BY ECF

Hon. Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

The parties have met and conferred and have agreed to the following schedules for sentencing, post-verdict motions and submission of offense conduct to the Probation Office:

For sentencing, the defense proposes that the Probation Office provide the parties with a Pre-Sentence Investigation Report on or before September 5, 2025; that the defense sentencing memorandum and objections to the PSR be filed on or before September 8, 2025; that the Government's sentencing memorandum and objections to the PSR be filed on or before September 15, 2025 and that the sentencing hearing take place on September 22, 2025. The Government does not object to this schedule, subject to the consent of the United States Probation Office.

For post-verdict motions, the parties propose that the defense file any post-verdict motions on or before July 30, 2025 and that the Government respond on or before August 20, 2025.

Finally, the Government requests that it be permitted to submit its summary of offense conduct on or before July 11, 2025, and the defense does not object. We appreciate the Court's consideration.

Respectfully submitted,



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Marc Agnifilo

cc: All counsel (by ECF)